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March 4, 2022

VIA ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. McBean et al., 20 Cr. 00260 (PKC)

Dear Judge Chun:

My office represents Mark Waiters in the above-captioned matter. Per the schedule set by this Court at the January 7, 2022 status conference, pretrial motions are due on March 8, 2022. I respectfully request an adjournment of that deadline to April 8, 2022 and further request that the Court adjust the government's response and defense reply, and that a conference be scheduled thereafter, at the Court's convenience. This is the first request for an extension of time.

The defense is still reviewing all of the discovery to determine whether a motion to suppress is appropriate. Therefore, I respectfully request an opportunity to file such motions at a future time, depending on the circumstances.

Michael Lambert, Esq. counsel to Mr. McBean joins in this request; The government has no objection.

Respectfully submitted,

/s/ Mitchell C. Elman

MITCHELL C. ELMAN

Cc: All Government Counsel (via ECF)
Michael Lambert, Esq. (Via ECF)

